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**From:** Chew, Sandra [Chew.Sandra@epa.gov]  
**Sent:** 6/19/2019 4:12:28 PM  
**To:** Mustain, Erin@Waterboards [Erin.Mustain@waterboards.ca.gov]; Jauregui, Renan@Waterboards [Renan.Jauregui@waterboards.ca.gov]; Martinez, Armando@Waterboards [Armando.Martinez@Waterboards.ca.gov]  
**CC:** Chaparro, Salvador@Waterboards [Salvador.Chaparro@Waterboards.ca.gov]; Buffleben, Matthew@Waterboards [Matthew.Buffleben@waterboards.ca.gov]; Farsimadan, Afrooz@Waterboards [Afrooz.Farsimadan@Waterboards.ca.gov]; WEISS, MICHAEL [weiss.michael@epa.gov]; AUBUCHON, ELIZABETH [aubuchon.elizabeth@epa.gov]; Sarah Torres [sarah.torres@pgenv.com]  
**Subject:** RE: FINAL - CA 2019 QNCR Qtr 2 - CA0022756  
**Attachments:** QNCR Coordinators with Detailed NODI-CA0022756.pdf; CA - RB1 Unresolved DMR Violations.pdf

Hi Erin,

The "QNCR Coordinators" report is the one I usually send you; this does not show exactly everything. Only "Entire Missing DMRs" would show on this report. I ran the "QNCR Coordinators with Detail NODI" (see attachment) report. This report shows you the invalid NODI used which triggered the "D" for quarter 1 and 2. Check the NODI Detail tab that will show all the invalid NODI used. I've also included the Unresolved Violation report for RB1, which also contains the invalid NODI codes for Crescent City.

Hope this helps clarify your question.

**SANDRA CHEW**

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**From:** Mustain, Erin@Waterboards <Erin.Mustain@waterboards.ca.gov>  
**Sent:** Tuesday, June 18, 2019 12:18 PM  
**To:** Chew, Sandra <Chew.Sandra@epa.gov>; Jauregui, Renan@Waterboards <Renan.Jauregui@waterboards.ca.gov>; Martinez, Armando@Waterboards <Armando.Martinez@Waterboards.ca.gov>  
**Cc:** Chaparro, Salvador@Waterboards <Salvador.Chaparro@Waterboards.ca.gov>; Buffleben, Matthew@Waterboards <Matthew.Buffleben@waterboards.ca.gov>; Farsimadan, Afrooz@Waterboards <Afrooz.Farsimadan@Waterboards.ca.gov>; WEISS, MICHAEL <weiss.michael@epa.gov>; AUBUCHON, ELIZABETH <aubuchon.elizabeth@epa.gov>; Sarah Torres <sarah.torres@pgenv.com>  
**Subject:** RE: FINAL - CA 2019 QNCR Qtr 2

Sandra,

Sorry that I wasn't clear. Crescent City is showing up as SNC (D) for Quarters 1 and 2 on the Summary. That is what I don't understand, because they aren't on the QNCR.

Thanks,  
Erin

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**From:** Chew, Sandra <Chew.Sandra@epa.gov>  
**Sent:** Tuesday, June 18, 2019 8:19 AM  
**To:** Mustain, Erin@Waterboards <Erin.Mustain@waterboards.ca.gov>; Jauregui, Renan@Waterboards <Renan.Jauregui@waterboards.ca.gov>; Martinez, Armando@Waterboards <Armando.Martinez@Waterboards.ca.gov>

Cc: Chaparro, Salvador@Waterboards <Salvador.Chaparro@Waterboards.ca.gov>; Buffleben, Matthew@Waterboards <Matthew.Buffleben@waterboards.ca.gov>; Farsimadan, Afrooz@Waterboards <Afrooz.Farsimadan@Waterboards.ca.gov>; Michael Weiss <weiss.michael@epa.gov>; AUBUCHON, ELIZABETH <aubuchon.elizabeth@epa.gov>; Sarah Torres <sarah.torres@pgenv.com>  
**Subject:** RE: FINAL - CA 2019 QNCR Qtr 2

Here is the first run of the QNCR, ran on 5/6/19, which shows Crescent City had missing DMRs for INF-A for MED 11/30/18 with a resolution code of "1" - Unresolved RNC.

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On 5/24/2019 the resolution code has been changed to "2" which brings them "Back into Compliance." Therefore this did not show on the recent QNCR.

NPDESID: CA0022758		Limit Set: INFA		Monitoring Period End Date: 11/30/2018		
DMR Parameters						
Parameter Code:	00310	Monitoring Location Code:	G	Season ID: 0	Start Date: 04/01/2017	End Date: 03/31/2022
Parameter Desc:	BOD, 5-day, 20 deg. C	Monitoring Location Desc:	Raw Sewage Influent			
	Violation Type	RNC Detection Code	RNC Detection Date	RNC Resolution Code	RNC Resolution Date	
C3	D80	K	03/04/2019	2	05/24/2019	
Parameter Code:	00530	Monitoring Location Code:	G	Season ID: 0	Start Date: 04/01/2017	End Date: 03/31/2022
Parameter Desc:	Solids, total suspended	Monitoring Location Desc:	Raw Sewage Influent			
	Violation Type	RNC Detection Code	RNC Detection Date	RNC Resolution Code	RNC Resolution Date	
C3	D80	K	03/04/2019	2	05/24/2019	
Parameter Code:	50050	Monitoring Location Code:	G	Season ID: 0	Start Date: 04/01/2017	End Date: 03/31/2022
Parameter Desc:	Flow, in conduit or thru treatment plant	Monitoring Location Desc:	Raw Sewage Influent			
	Violation Type	RNC Detection Code	RNC Detection Date	RNC Resolution Code	RNC Resolution Date	
Q1	D80	N	03/04/2019	2	05/24/2019	
Q2	D80	K	03/04/2019	2	05/24/2019	

You are correct that there are Effluent violations in ICIS. Please note that not all effluent violations are counted as SNCs in the QNCR. It depends on which group (I or II) the pollutant is in and also the magnitude and frequency of the effluent violations which then determines if the violation is in the Technical Review Criteria (TRC) or Chronic (CHR) category. Since there were only four E90s with different pollutants, the QNCR did not put the effluent violations in SNC. The State can determine whether to enter an SEV for these effluent violations or leave them as is.

Violation Type	Violation Description	Violation Code	Violation Date
Effluent Violation	001 A 81010 BOD, 5-day, percent removal Percent Removal Season ID: 0 C1	E90	09/30/2018
Effluent Violation	001 A 81011 Solids, suspended percent removal Percent Removal Season ID: 0 C1	E90	09/30/2018
Effluent Violation	001 A 90080 Chlorine, total residual Effluent Gross Season ID: 0 C2	E90	01/31/2019
Effluent Violation	001 A 90080 Chlorine, total residual Effluent Gross Season ID: 0 C3	E90	01/31/2019

## Here is the calculation:

- TRC
  - 2 violations out of 6 months
  - Same parameter, same permitted feature
  - Group 1 – Conventional parameters
    - Limit X 1.4
  - Group 2 – Toxics / metals
    - Limit x 1.2
- Chronic
  - 4 out of 6 months – any magnitude
- Discretionary violations of concern

### SANDRA CHEW

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**From:** Mustain, Erin@Waterboards <[Erin.Mustain@waterboards.ca.gov](mailto:Erin.Mustain@waterboards.ca.gov)>

**Sent:** Monday, June 17, 2019 4:07 PM

**To:** Chew, Sandra <[Chew.Sandra@epa.gov](mailto:Chew.Sandra@epa.gov)>; Jauregui, Renan@Waterboards <[Renan.Jauregui@waterboards.ca.gov](mailto:Renan.Jauregui@waterboards.ca.gov)>; Martinez, Armando@Waterboards <[Armando.Martinez@Waterboards.ca.gov](mailto:Armando.Martinez@Waterboards.ca.gov)>

**Cc:** Chaparro, Salvador@Waterboards <[Salvador.Chaparro@Waterboards.ca.gov](mailto:Salvador.Chaparro@Waterboards.ca.gov)>; Buffleben, Matthew@Waterboards <[Matthew.Buffleben@waterboards.ca.gov](mailto:Matthew.Buffleben@waterboards.ca.gov)>; Farsimadan, Afrooz@Waterboards <[Afrooz.Farsimadan@Waterboards.ca.gov](mailto:Afrooz.Farsimadan@Waterboards.ca.gov)>; WEISS, MICHAEL <[weiss.michael@epa.gov](mailto:weiss.michael@epa.gov)>; AUBUCHON, ELIZABETH <[aubuchon.elizabeth@epa.gov](mailto:aubuchon.elizabeth@epa.gov)>; Sarah Torres <[sarah.torres@pgenv.com](mailto:sarah.torres@pgenv.com)>

**Subject:** RE: FINAL - CA 2019 QNCR Qtr 2

Is there a reason that not all of the facilities that are on the original 5/4/2019 QNCR are on the QNCR spreadsheets that were uploaded to the SharePoint? For example, I'd like to know what is happening with Crescent City. It was on the first run of QNCR, but not included on the spreadsheet for majors.

Further, what is wrong with ICIS? Crescent city is showing up as "D," but has group II effluent violations (E90), which is higher in the hierarchy that reporting violations. Is that D being carried over from the previous quarter? Crescent City's permit number is CA0022756. We can't have effluent limit violations hiding behind baloney.

Erin

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**From:** Chew, Sandra <[Chew.Sandra@epa.gov](mailto:Chew.Sandra@epa.gov)>

**Sent:** Monday, June 17, 2019 8:34 AM

**To:** Jauregui, Renan@Waterboards <[Renan.Jauregui@waterboards.ca.gov](mailto:Renan.Jauregui@waterboards.ca.gov)>; Martinez, Armando@Waterboards <[Armando.Martinez@Waterboards.ca.gov](mailto:Armando.Martinez@Waterboards.ca.gov)>

**Cc:** Mustain, Erin@Waterboards <[Erin.Mustain@waterboards.ca.gov](mailto:Erin.Mustain@waterboards.ca.gov)>; Chaparro, Salvador@Waterboards <[Salvador.Chaparro@Waterboards.ca.gov](mailto:Salvador.Chaparro@Waterboards.ca.gov)>; Buffleben, Matthew@Waterboards <[Matthew.Buffleben@waterboards.ca.gov](mailto:Matthew.Buffleben@waterboards.ca.gov)>; Farsimadan, Afrooz@Waterboards <[Afrooz.Farsimadan@Waterboards.ca.gov](mailto:Afrooz.Farsimadan@Waterboards.ca.gov)>; Michael Weiss <[weiss.michael@epa.gov](mailto:weiss.michael@epa.gov)>; AUBUCHON, ELIZABETH <[aubuchon.elizabeth@epa.gov](mailto:aubuchon.elizabeth@epa.gov)>; Sarah Torres <[sarah.torres@pgenv.com](mailto:sarah.torres@pgenv.com)>

**Subject:** FINAL - CA 2019 QNCR Qtr 2

Renan/Armando,

The Official QNCR for FY2019 Qtr 2 ran over the weekend on 6/15/2019. Attached are the final 2019 QNCR Qtr 2 reports.

**SANDRA CHEW**

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